

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC;
IRISH BLUE & GOLD, INC.; and XTX
MARKETS LIMITED,

Plaintiffs,

vs.

CURRENEX, INC.; GOLDMAN SACHS &
CO. LLC; HC TECHNOLOGIES, LLC;
STATE STREET BANK AND TRUST
COMPANY; STATE STREET GLOBAL
MARKETS INTERNATIONAL LIMITED;
and JOHN DOE DEFENDANTS 1-5,

Defendants.

Case No. 21-cv-06598-LAK

**NOTICE OF MOTION FOR ISSUANCE OF A LETTER OF REQUEST PURSUANT TO
THE HAGUE CONVENTION ON THE TAKING OF EVIDENCE ABROAD IN CIVIL
OR COMMERCIAL MATTERS DATED MARCH 18, 1970**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Daniel L. Brockett, dated June 23, 2025 (“Brockett Declaration”), Plaintiffs respectfully move this Court, before the Honorable Lewis A. Kaplan, on such date and at such time as the Court may direct, to issue a Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters Dated March 18, 1970 (“Letter of Request”) for the production of documents and taking of testimony overseas, pursuant to 28 U.S.C. § 1781, Federal Rule of Civil Procedure 28(b), and Chapter I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No. 74444, 23 U.S.T. 2555. The proposed Letter of Request is attached as Exhibit 1 to the Brockett Declaration.

DATED: June 23, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Daniel L. Brockett

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Class*